

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

VALLEY HEALTH SYSTEM, LLC, a Delaware  
Limited Liability company, DVH HOSPITAL  
ALLIANCE, LLC, a Delaware Limited Liability  
company, and SUMMERLIN HOSPITAL  
MEDICAL CENTER, LLC, a Delaware Limited  
Liability company,

Plaintiffs,

vs.

TRAVEL INSURANCE FACILITIES, PLC, a  
Foreign Corporation, UNION  
REISEVERSICHERUNG  
AKTIENGESELLSCHAFT, a Foreign  
Corporation,

Defendants.

CASE NO.: 2:22-CV-00365-ART-DJA

**ORDER APPROVING STIPULATION  
TO EXTEND TIME FOR PLAINTIFFS  
TO FILE RESPONSE TO  
DEFENDANT UNION  
REISEVERSICHERUNG  
AKTIENGESELLSCHAFT'S  
MOTION TO DISMISS OR, IN THE  
ALTERNATIVE, FOR A MORE  
DEFINITE STATEMENT**

**[FIRST REQUEST]**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs VALLEY HEALTH SYSTEM, LLC; DVH HOSPITAL ALLIANCE, LLC, and SUMMERLIN HOSPITAL MEDICAL CENTER, LLC (collectively, “Plaintiffs”) by and through their counsel of record, Timothy M. Hartley, Esq. (admitted *pro hac vice*) of the Hartley Law Offices and Jason M. Wiley, Esq. of the law firm Wiley Petersen and Defendant UNION REISERVERSICHERUNG AKTIENGESELLSCHAFT (“URV”) by and through its counsel of record, Pat Lundvall, Esq. and Daniel Aquino, Esq. of the law firm McDonald Carano to extend the time for Plaintiffs to file a response to *Defendant Union Reiseversicherung Aktiengesellschaft’s Motion to Dismiss or, in the Alternative, For a More Definite Statement* (“Motion”). ECF No. 24. The Motion was filed on June 30, 2022, and no hearing date has been scheduled. The parties respectfully request the Court enter an order extending the deadline for Plaintiffs to respond to the Motion to July 22, 2022.

The parties offer the following reasons for the requested extension:

1. On June 30, 2022, URV filed its Motion.
2. In order to fully and adequately respond to URV’s Motion, Plaintiffs filed their *Motion for Leave to Conduct Limited Jurisdictional Discovery* (“Jurisdictional Discovery Motion”). ECF No. 25.
3. Defendant TRAVEL INSURANCE FACILITIES, PLC (“TIF”), has yet to be served with the Summons and Complaint through international service procedures pursuant to Fed.R.Civ.P. 4.
4. It is anticipated that, once service does occur, TIF will assert similar argument as advanced by URV in its Motion.
5. During the extension period, the parties will utilize the time to (a) determine whether TIF has been served; (b) discuss how the Jurisdictional Discovery Motion affects the Motion; and (c) formulate a plan regarding the Motion, Jurisdictional Discovery Motion, and other related matters.
6. The requested extension will not unduly prejudice any party to the litigation.

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7. The stipulation is made in good faith, not for purposes of delay, and will not cause undue harassment or delay.

DATED this 14<sup>th</sup> day of July, 2022

DATED this 14<sup>th</sup> day of July, 2022

**MCDONALD CARANO**

**WILEY PETERSEN**

/s/ Daniel Aquino

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*Attorneys for Plaintiffs*

**IT IS SO ORDERED:**

**DATED: July 19, 2022**



**ANNE R. TRAUM**

**UNITED STATES DISTRICT JUDGE**